

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
)	
v.)	CRIM. NO. 05-30020-MAP
)	
)	
EDDIE SANTIAGO,)	
)	
Defendant.)	

MOTION FOR EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, hereby moves this Court for an order of excludable delay under the Speedy Trial Act for the period of time from February 8, 2006, the date of the most recent status conference in this matter, March 8, 2006, the next scheduled status conference date. As grounds for this motion, the government states that the defendant's counsel will be using the time to review materials recently produced by the government in response to the defendant's discovery request, arranging to listen to and watch the original audio and video recordings of the alleged drug transactions involving his client, and obtaining and reviewing materials to determine whether the defendant's prior convictions are constitutionally valid. Accordingly, the time period described above should be excluded in the interests of justice, pursuant to 18 U.S.C. § 3161(h)(8)(A).

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:

/s/ Thomas J. O'Connor, Jr.
Thomas J. O'Connor, Jr.
Assistant U.S. Attorney

Dated: February 8, 2006

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Vincent A. Bongiorno, Esq.
95 State Street
Springfield, MA 01103

This 8th day of February, 2006.

/s/ Thomas J. O'Connor, Jr.
Thomas J. O'Connor, Jr.
ASSISTANT U.S. ATTORNEY